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Attorneys for defendant

HAAS INDUSTRIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO

ONE BEACON INSURANCE COMPANY,)	CASE NO. 3:07-CV-03540-BZ
a corporation,)	
)	DECLARATION OF GEOFFREY W.
Plaintiff,)	GILL RE: ORDER TO SHOW CAUSE
)	
vs.)	Date: June 26, 2008
)	Time: 4:00 p.m.
HAAS INDUSTRIES, INC., a)	Courtroom: Courtroom G
corporation,)	Hon. Bernard Zimmerman
)	
Defendants.)	
)	
)	
)	
)	

1. At all times relevant, I have been an attorney at law, duly admitted to practice before this court as well as federal and state courts in the states of California, New York and Florida. As "Of Counsel" to the law firm Countryman & McDaniel, Counsel for defendant Haas Industries, Inc., I am the attorney responsible for handling the above captioned matter. I respectfully submit this declaration in reference to the order to show cause returnable at the pre-trial conference of this matter, set for June 26, 2008.

1 2. On Thursday, June 5, 2008, in reviewing the file of this
2 matter, I realized to my great embarrassment I, as well as
3 plaintiff's counsel, had missed the date set for filing various
4 pre-trial papers twenty (20) days before the originally set June
5 23, 2008 pre-trial conference. I immediately placed a call to
6 plaintiff's counsel, James Attridge, in the expectation that he and
7 I could agree upon an approach most likely to mitigate further
8 inconvenience to the court arising from this oversight and propose
9 that approach in some manner to the court. Before hearing back
10 from Mr. Attridge, I received a call from the court's clerk and
11 upon discussing the matter with her, submitted a motion for an
12 extension of time within which to file the requisite pre-trial
13 papers. Mr. Attridge agreed with this approach.

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15 3. Fortunately, this case has been characterized by amicably
16 professional dealings between Mr. Attridge and myself, and we have
17 been able, notwithstanding that the case has not settled, to agree
18 on numerous issues thereby minimizing the need for any judicial
19 intervention. Following the June 11, 2008 mediation, we agreed
20 upon limiting issues for trial, for example, excluding the issue of
21 reasonableness of the Haas limitation that had been submitted as an
22 issue in plaintiff's motion for summary judgment.

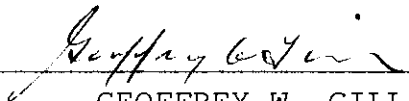
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24 4. As a result of further discussions with the court, the
25 court permitted the parties to file their pre-trial papers on
26 Friday, June 13, 2008. Mr. Attridge and I agreed that defendant
27 would undertake the preparation and submission of the joint pre-
28 trial conference statement and plaintiff's counsel would coordinate

1 and file the exhibits.
2

3 5. My failure to adhere to the court's originally set
4 schedule was inadvertent and attributable to oversight on my part.
5 I do regret and apologize to the court for any inconvenience
6 resulting. In consequence of this uncharacteristic oversight, I
7 have reassessed and tightened my personal calendaring procedures.
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9 I declare under penalty of perjury under the laws of the State
10 of California and United States of America that the foregoing is
11 true and correct.
12

13 Executed at Los Angeles, California on June 23, 2008.

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15 _____
16 GEOFFREY W. GILL
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